

IN RE: : CHAPTER 13
:
Robertin Nunez : No. 15-15811-MDC
Debtor :

OBJECTION TO CERTIFICATE OF DEFAULT

Debtor, by Attorney David M. Offen, objects to the Certificate of Default of Specialized Loan Servicing, LLC. On the following basis:

Debtor entered into a forbearance agreement with Specialized Loan Servicing, LLC. as entered into this court on May 12, 2020 permitting the debtor to resume mortgage payments June 1, 2020. Debtor will supply all proofs of payments made during this time and requests Movant to supply full accounting from the time of the requested forbearance. Debtor avers he can catch up should any arrears remain.

WHEREFORE, Debtor, respectfully requests a Hearing and for this Honorable Court to not enter an Order granting Relief.

Respectfully submitted,

/s/ David M.Offen
David M. Offen
Attorney for Debtor
Suite 160 West, Curtis Center
601 Walnut Street
Philadelphia, PA 19106
215-625-9600

Dated:7/28/20

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CERTIFICATE OF SERVICE

The following has been served by electronic mail:

Kristen D. Little on behalf of Specialized Loan Servicing, LLC.

Pabk@logs.com

/s/ David M.Offen
David M. Offen
Attorney for Debtor
Suite 160 West, Curtis Center
601 Walnut Street
Philadelphia, PA 19106
215-625-9600

Dated:7/28/20